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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARLAND JACKSON, MOTHER (Wilma
Banks),

Plaintiff,

v.

STATE OF NEVADA, DOC, *et al.*,

Defendants.

Case No. 2:23-cv-02015-CDS-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
(SECOND REQUEST)**

Plaintiff, Marland Jackson, Mother (Wilma Banks) ("Plaintiff"), through her attorney, C. Benjamin Scroggins, Esq. of Law Firm of C. Benjamin Scroggins, and Interested Party Nevada Department of Corrections, through their attorneys of record, Aaron D. Ford, Esq., and Jamie S. Hendrickson, Senior Deputy Attorney General, of the Office of the Attorney General, respectfully submit the following Stipulation to extend discovery deadlines (second request.)

I. MEETING

- a. C. BENJAMIN SCROGGINS, ESQ. of The Law Firm of C. Benjamin Scroggins, Chtd., representing Plaintiffs'; and
- b. JAMIE S. HENDRICKSON, Senior Deputy Attorney General of The Office of Nevada Attorney General, representing Defendants, State of Nevada ex rel. Nevada Department of Corrections, Antonio Bryant, Ivon Dubon, Calvin Johnson and Gabriel Yanez;

- c. Counsel met and conferred on or about June 30, 2025, concerning the subject request to extend discovery deadlines.

II. INITIAL DISCLOSURES

- a. Plaintiffs' and Defendants' discovery is ongoing and continuing to supplement.

III. DISCOVERY PLAN/DEADLINES

- a. The Parties are seeking to request additional time to extend discovery by 60 days, thus allowing them time to permit a settlement conference.
- b. Plaintiff's counsel recently granted Defendants', until August 4th, 2025, to respond to their interrogatories. Both parties agree and respectfully request a continuance for all pretrial deadlines, proposing the following:

	Current Deadline Date	Proposed Deadline Date
Discovery Cut-Off	August 5, 2025	October 6, 2025
Initial Disclosures	October 7, 2024	Closed
Amend Pleadings or Add Parties	May 7, 2025	Closed
Initial Expert Disclosures	June 6, 2025	Closed
Rebuttal Expert Disclosures	July 8, 2025	Closed
Dispositive Motions	September 4, 2025	November 3, 2025
Joint Pre-Trial Order	October 6, 2025	December 5, 2025

IV. JUSTIFICATION FOR LONGER DISCOVERY PERIOD

This is a wrongful death case with multiple defendants and voluminous records that must be obtained and reviewed. There has been a delay in obtaining some of the crucial records needed in the litigation due to the need to have a Special Administrator appointed. Additionally, the attorney representing the defendants was only recently assigned to the case. Counsel have discussed permitting the extension request to allow the parties to coordinate a possible settlement conference.

V. OTHER ISSUES

a. Alternative Dispute Resolution

The parties believe that this case might be appropriate for a mediation or settlement conference. However, there is much discovery to be obtained and reviewed before such efforts would be meaningful.

By entering into this stipulation, none of the parties waive any rights or defenses they have under statute, law, or rule with respect to Plaintiff's complaint.

DATED this 7th day of July, 2025.

DATED this 7th day of July, 2025.

AARON D. FORD
Attorney General

By: /s/ C. Benjamin Scroggins
C. BENJAMIN SCROGGINS
(Bar no. 7902)
Attorney for Plaintiff

By: /s/ Jamie S. Hendrickson
JAMIE S. HENDRICKSON
(Bar No. 12770)
Senior Deputy Attorney General
Attorneys for Interested Party

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATE: 7/9/2025

From: [Jamie S. Hendrickson](#)
To: [Kelly](#); [Ben Scroggins](#)
Cc: [Trisha A. Taylor](#)
Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses
Date: Thursday, July 3, 2025 4:28:14 PM

Approved. You may affix my electronic signature thereon.

Jamie S. Hendrickson
Senior Deputy Attorney General
Office of the Nevada Attorney General
Public Safety Division

From: Kelly <kelly@cbscrogginslaw.com>
Sent: Thursday, July 3, 2025 11:30 AM
To: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>; Ben Scroggins <cbs@cbscrogginslaw.com>
Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>
Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses
Importance: High

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Mr. Hendrickson,

Here is the Stipulation for your review.

Looking forward your response!

Kelly Jarvi,

Legal Assistant to,
The Law Firm of C. Benjamin Scroggins, Chtd.
302 East Carson Avenue, 10th Floor
Las Vegas, NV 89101
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F: (702) 442-8860

Kelly@cbscrogginlaw.com

From: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>
Sent: Tuesday, July 1, 2025 9:32 AM
To: Kelly <kelly@cbscrogginlaw.com>; Ben Scroggins <cbs@cbscrogginlaw.com>
Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>
Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses

We should extend discovery to permit a settlement conference.

Jamie S. Hendrickson
Senior Deputy Attorney General
Office of the Nevada Attorney General
Public Safety Division

From: Kelly <kelly@cbscrogginlaw.com>
Sent: Monday, June 30, 2025 6:58 PM
To: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>; Ben Scroggins <cbs@cbscrogginlaw.com>
Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>
Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses
Importance: High

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Hendrickson,

Mr. Scroggins asked if you are open to pushing the pretrial deadlines out by 60 days, since extending the response date to August 4, 2025, and close of discovery being August 5th, 2025.

Which would allow additional time for both parties to review the discovery, schedule depositions, etc.

Please advise of your position on this and if you have any insights to include in the stipulation.

Thank you and Happy Monday!



Kelly Jarvi,

Legal Assistant to,
The Law Firm of C. Benjamin Scroggins, Chtd.

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Kelly@cbscrogginslaw.com

From: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>

Sent: Friday, June 27, 2025 2:19 PM

To: Kelly <kelly@cbscrogginslaw.com>; Ben Scroggins <cbs@cbscrogginslaw.com>

Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>

Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses

Monday, August 4, 2025.

Jamie S. Hendrickson
Senior Deputy Attorney General
Office of the Nevada Attorney General
Public Safety Division

From: Kelly <kelly@cbscrogginslaw.com>

Sent: Friday, June 27, 2025 2:18 PM

To: Ben Scroggins <cbs@cbscrogginslaw.com>; Jamie S. Hendrickson <jhendrickson@ag.nv.gov>

Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>

Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses

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Might I inquire with the proposed due date, so I may place on calendar?

Sorry to bother. Hope everyone has a great weekend.

Kelly Jarvi,

Legal Assistant to,

The Law Firm of C. Benjamin Scroggins, Chtd.

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Kelly@cbscrogginslaw.com

From: Ben Scroggins <cbs@cbscrogginslaw.com>

Sent: Thursday, June 26, 2025 12:29 PM

To: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>; Kelly <kelly@cbscrogginslaw.com>

Cc: Trisha A. Taylor <TTaylor@ag.nv.gov>

Subject: RE: Jackson, Marland - Wilma Banks - Discovery Responses

The email is fine. I was referring to the stipulation for the personnel records.

Very truly yours,

C. Ben Scroggins

C. Benjamin Scroggins, Esq.

Attorney and Counselor at Law

THE LAW FIRM OF

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From: Jamie S. Hendrickson <jhendrickson@ag.nv.gov>